

# Waste Site Cleanup Advisory Committee Meeting

Thursday, August 24, 2016

MassDEP  
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Boston, MA 02108

[www.Mass.Gov/dep](http://www.Mass.Gov/dep)

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## AGENDA

- Welcome & General Updates
- Draft Historic Fill guidance
- Status of other guidance development
- Status of TCE site review
- Soil management updates,
- PFOS/PFOA Update
- Other...

# Placeholder for General Updates

- Budget
- Staffing: Hiring & Retirements
- Inland Oil Spill Trailers
- MCP 5 Minute Moments
- Site Work
- Other DEP Activities

Pb in drinking water, EO562, NPDES delegation,  
Kane Decision, EIPASS, WIFI, etc...

# Comments on DRAFT Historic Fill Guidance

(11 Sets)

Summary & Discussion of Common Themes

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1. Weight of Evidence, Line of Evidence & Conceptual Site Model  
vs  
Listed Concentrations & Recommended Approaches

When & How Does an LSP Exercise Professional Judgement?

# Summary & Discussion of Common Themes

2. How Much Is Too Much (primarily composed of)  
and  
How Little Is *de minimus* Enough?

# Summary & Discussion of Common Themes

## 3. Other Definitional Issues

- Sub-areas
- Slag
- Re-Worked Soils
- Coal & Wood Ash
- Dredge Spoils

# Summary & Discussion of Common Themes

## 4. Applicability to

- Releases On Fill
- Fill On Releases
- Fill Beside Releases
- Fill Beside Fill Beside Fill...



# Summary & Discussion of Common Themes

5. Take Out Specific Technical Recommendations
6. Provide Additional Technical Discussion & Recommendation

# Summary & Discussion of Common Themes

## 7. Chemical – Specific Comments

- Lead
- PCBs
- Metals
- VOCs
- Petroleum
- Asbestos
- PAHs
- More PCBs...

# Summary & Discussion of Common Themes

8. Tables

9. Miscellaneous Edits

# Status of Other Guidance Development

- Vapor Intrusion
- Activity & Use Limitations
- MCP Q & A Revisions

# Status of TCE Vapor Intrusion Site Work

Not Just “Closed” Sites:

- Downgradient Property Status
- Financial Inability
- Temporary Solutions
- Permanent Solutions (RAOs) in past
- Partial Permanent Solutions (RAO-P)
- Adequately Regulated Sites
- Active (in process) Sites
- Self-Motivated Re-Notifications
- BRAND NEW Sites

## EXAMPLE: Partial Permanent Solution

The site is reportedly nearing a (complete) Permanent Solution and was identified in DEP review as having potential for exposures of concern.

PRP was contacted and following a technical meeting with DEP, they submitted a plan for assessment of indoor air at three residences and two commercial properties.

Only one residential property owner has (so far) agreed to allow access. DEP is working with the PRP to obtain access to the remaining properties so that assessment can proceed.

## EXAMPLE: Inquiry -> File Review -> Sampling

DEP received anonymous inquiry about potential for TCE to migrate to day care adjacent to closed site (1999 B-1 RAO).

Records indicated elevated soil gas (TCE at 22,000  $\mu\text{g}/\text{m}^3$ ) within 30 ft. from abutting restaurant.

Site visit: day care is no longer operating at that location.

Restaurant indoor air sampled by MassDEP and found TCE detected but at No Significant Risk. Restaurant owner notified and provided results. No further assessment recommended.

# EXAMPLE: Downgradient Property Status Site

MassDEP received and reviewed DPS from a property reporting elevated levels of TCE in groundwater.

After review, NOR issued to adjacent 'source' property.

Indoor Air evaluation conducted finding no IH (building has no full-time workers nor women of child-bearing age).

Pending results of Phase I for Source Property, status of DPS for adjacent property will be evaluated.



# EXAMPLE: Screening of Closed TCE Sites

Site closed in 2002 with an A-2 RAO.

File review indicated potential for elevated TCE groundwater concentrations near residences downgradient from source area.

PRP declined to conduct indoor air and sub-slab soil gas sampling to evaluate current conditions.

DEP has sent out letters requesting access consent from site's owner and 8 residential property owners to conduct the follow-up work.

# EXAMPLE: Abandoned Property

Site since 1987 – not closed.

10's of mg/l levels of TCE in shallow and deep groundwater on site.  
Plume has migrated 1800' downgradient into off-property wetland.

Property is currently vacant and off-property receptors to groundwater plume have been evaluated and ruled out.

MassDEP has proposed the Site the National Priorities List (NPL).

# Soil Management Updates

## Facilities Accepting Reclamation Soil

Posted on [August 9, 2016](#)

The Department is working with a number of proposed Reclamation Projects and we anticipate several more facilities will be approved in the near future. This list will be updated periodically. As of July 6, 2016, the following facilities have MassDEP approval (in the form of a signed Administrative Consent Order) to accept Reclamation Soil:

- **St. Mary's Cemetery, Tewksbury, MA**
  - [Administrative Consent Order \(ACO\)](#)
  - [Fill Management Plan \(FMP\)](#)
  - [Clarification Letter – 12-23-2013](#)
- **Jordan Overlook Farm, Rutland, MA**
  - [Administrative Consent Order \(ACO\)](#)
  - [Soil Re-Use Management Plan \(SRMP\) – Part 1](#)
  - [Soil Re-Use Management Plan \(SRMP\) – Part 2](#)
- **Dudley Reclamation Project, Dudley, MA**
  - [Administrative Consent Order \(ACO\)](#)
  - [Fill Management Plan \(FMP\)](#)
- **Route 44 Development Project, Carver, MA**
  - [Administrative Consent Order \(ACO\)](#)
  - [Fill Management Plan \(FMP\) – Part 1](#)
  - [Fill Management Plan \(FMP\) – Part 2](#)
  - [Fill Management Plan \(FMP\) – Part 3](#)
- **Green Acres, Uxbridge, MA**
  - [Administrative Consent Order \(ACO\) and Soil Management Plan \(SMP\) combined](#)

# PFOS & PFOA Updates

Public Water Supplies

Source/Site Discovery

- RFIs
- NORs

What It Means to Be a Hazardous Material

Questions?

Suggestions?

Comments?